

REC'D TN
REGULATORY AUTH.



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BellSouth Telecommunications, Inc.

333 Commerce Street
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Nashville, TN 37201-3300

guy.hicks@bellsouth.com

OFFICE OF THE
EXECUTIVE SECRETARY
September 28, 2000

Guy M. Hicks
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VIA HAND DELIVERY

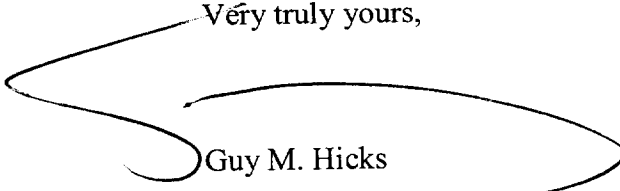
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Complaint of Intermedia Communications, Inc. Against BellSouth
Telecommunications, Inc. To Enforce The Reciprocal Compensation Requirement
of the Parties' Interconnection Agreement*
Docket No. 00-00280

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Issues List of BellSouth Telecommunications, Inc. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Complaint of Intermedia Communications, Inc. Against BellSouth Telecommunications, Inc. To Enforce The Reciprocal Compensation Requirement of the Parties' Interconnection Agreement*

Docket No. 00-00280

ISSUES LIST OF BELL SOUTH TELECOMMUNICATIONS, INC.

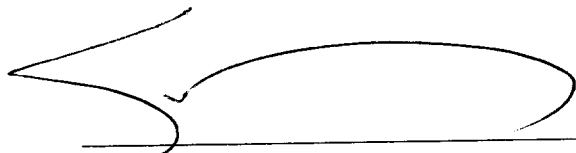
COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), in accordance with the Order Establishing Procedural Schedule dated September 12, 2000, and provides its Issues List as follows:

1. Under the BellSouth and Intermedia Interconnection Agreement, as amended, did the Parties mutually agree to pay reciprocal compensation for the delivery of traffic to Internet Service Providers (ISPs)?
2. What is the applicable rate(s) that Intermedia and BellSouth are obligated to use to compensate each other for transport and termination of local traffic in Tennessee pursuant to the terms of their Interconnection Agreement, as amended?

WHEREFORE, BellSouth respectfully requests that the Pre-Hearing Officer adopt BellSouth's Issues List Authority convene a contested case and find in favor of BellSouth.

Respectfully submitted.

BELL SOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

H. LaDon Baltimore, Esquire
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211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Scott Saperstein
Senior Policy Counsel
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